

December 17, 2018

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Promoting Telehealth in Rural America, WC Docket No. 17-310
Notice of *Ex Parte* Communication

Dear Ms. Dortch:

On Thursday, December 13, 2018, Leonard Steinberg and Jim Gutscher of Alaska Communications Systems Group, Inc. ("Alaska Communications"), Richard Cameron of Cameron Law & Policy LLC, and I met with Ryan Palmer, Liz Drogula and Trent Harkrader of the Commission's Wireline Competition Bureau regarding matters before the Commission in the above-captioned rulemaking. Alaska Communications emphasized the importance of predictability, knowing whether funding will be made available prior to the commencement of services (that is, before the start of the Funding Year). The uncertainty of support under the Telecom Program in Funding Years 2016, 2017, and now 2018, has driven healthcare providers out of the program, and wreaked havoc on service providers, all to the detriment of Americans that rely on the program in rural areas.

Alaska Communications proposes a number of specific reforms that would make the program more predictable as well as more efficient, based on the company's experience proving the cost basis for its rural rates. The enclosed hand-out, as well as the comments Alaska Communications previously filed in the docket, summarize the ideas discussed in this meeting. These reforms can be implemented nationwide. Alaska Communications intends to further discuss these proposals in supplemental comments as requested by the Bureau. *See Public Notice, Wireline Competition Bureau Seeks Additional Comment on Determining Urban and Rural Rates in the Rural Healthcare Program*, WC Docket No. 17-310, DA 18-1226 (WCB rel. Dec. 4, 2018).

Please direct any questions concerning this matter to me.

Respectfully submitted,



Karen Brinkmann
Counsel to Alaska Communications